

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
FORT WORTH DIVISION**

**MARCO PUENTE**

**v.**

**BLAKE SHIMANEK and  
ANKIT TOMER**

§  
§  
§  
§  
§  
§

**CASE NO. 4:20-cv-1329**

**STIPULATION OF DISMISSAL**

TO THE HONORABLE COURT:

Plaintiff Marco Puente and Defendants Blake Shimanek and Ankit Tomer (collectively, the “Parties”), through their attorneys of record, and pursuant to Rule 41(a)(1)(A)(ii) of the Federal Rules of Civil Procedure, file this Stipulation of Dismissal with respect to Plaintiff’s claims against Defendants. The Parties hereby stipulate to the **dismissal with prejudice** of all claims asserted by Plaintiff against the Defendants in this lawsuit. The Parties further stipulate that Plaintiff and the Defendants shall each bear their own costs and attorney’s fees.

Respectfully submitted,

/s/ Scott H. Palmer

Scott H. Palmer  
Texas Bar No. 00797196  
scott@scottpalmerlaw.com

James P. Roberts  
Texas Bar No. 24105721  
[james@scottpalmerlaw.com](mailto:james@scottpalmerlaw.com)

SCOTT H. PALMER, P.C.  
15455 Dallas Parkway,  
Suite 540, LB 32  
Dallas, Texas 75001  
Tel: (214) 987-4100  
Fax: (214) 922-9900  
*Attorneys for Plaintiff*

/s/ Robert. J. Davis

Robert J. Davis  
Texas Bar No. 05543500  
Matthews, Shiels, Knott, Eden, Davis &  
Beanland, L.L.P.  
8131 LBJ Freeway, Suite 700  
Dallas, Texas 75251  
[bdavis@mssattorneys.com](mailto:bdavis@mssattorneys.com)

*Attorney for Defendants*

### **CERTIFICATE OF SERVICE**

I certify that on January 29, 2021, I electronically filed the foregoing document with the clerk of the court for the U.S. District Court, Northern District of Texas, using the CM/ECF electronic case filing system of the court. The electronic case filing system will send a “Notice of Electronic Filing” notification to all case participants registered for electronic notice, including all *pro se* parties and/or attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means. I further certify that I have served to the extent applicable all case participants not registered for electronic notice by another manner authorized by Federal Rule of Civil Procedure 5(b)(2).

/s/ Scott H. Palmer

Scott H. Palmer